Part 68 should not require direct support of the 911 CAMA Trunk.

The various techniques that may be used to make an installation compatible with Enhanced 911 Calling Service are outlined in TSB 103. Part 68 registration requirements should assure that appropriate installation instructions are included with equipment. Those instructions should explain how an installation may be made compatible with Enhanced 911 Calling Service. It does not make sense to require that all equipment be inherently capable of transmitting caller CESID on a 911 CAMA trunk using MF signaling as a condition of registration, when there are many alternatives available.

Enhanced 911 Calling Service (with limitations) can be supported from MLTS wireless interfaces.

MLTS equipment can support Enhanced 911 Calling Service from stations connected via wireless interfaces, provided that equipment has the capability to transmit a CESID associated with the base antenna that receives the signal from the 911 caller. There are inherent problems with locating the caller, similar to those for CMRS callers, but on a smaller scale due to the reduced operating range of MLTS wireless interface handsets. It should also be noted that the MLTS equipment does not necessarily support 911 Calling Service from wireless adjuncts plugged into the wired station interface jack. The problem is similar to that of locating a "cordless" set user in a residence environment. Sometimes a user may be calling from the wired instrument associated with that interface jack, sometimes the user may be calling from the wireless instrument.

3. CMRS ISSUES

TIA agrees with the JEM Reports' conclusions for implementing CMRS compatibility with Enhanced 911.

As stated, the TIA fully supports the Commission's objective of maximizing the compatibility between wireless services and Basic 911 and Enhanced 911 systems. At the same time, the TIA respectively differs first with the Commission's assessment that the mobile industry would not voluntarily promote compatibility of wireless services and Enhanced 911 systems, and second with the Commission's proposal to require that various aspects of compatibility be implemented within fixed deadlines. In the TIA's view, the wireless industry has in fact been working hard to overcome the technical challenges to compatibility. However, tremendous technical challenges remain and adopting arbitrary compliance guidelines would be premature and counter-productive.

The Basic 911 and Enhanced 911 systems in existence today have been designed to provide rapid response to calls for emergency service from wireline subscribers. However, these emergency service systems do not address the unique characteristics of wireless communications. The mobile nature of wireless communications and the unique characteristics of radio frequency ("RF") propagation will require modification of existing emergency service systems and local exchange carrier interconnect networks, as well as the development of special capabilities in wireless systems. Equivalent access to Enhanced 911 for wireless subscribers will require the development of interworking Standards and the deployment of complex and as yet untested technology by these communities.

TIA has worked with members of the public safety and emergency response communities to:

- identify and prioritize PSAP service requirements
- identify the critical components of wireless/Enhanced 911 Calling Service compatibility and the associated information flows
- map the PSAP service requirements to four evolutionary paths to compatibility (based on the degree of modification needed to existing systems and mobile stations) that requires close coordination between wireless service systems, local exchange carriers and emergency service systems
- identify candidate location technologies that may eventually provide more accurate mobile station location information.

This work is documented in the two Joint Experts Meeting ("JEM") Reports already mentioned supra., at page 3. These JEM Reports demonstrate the commitment of the wireless industry to work towards compatibility. The JEM Reports also highlight the unreasonableness of mandating design requirements rather than performance standards, and setting deadlines rather than allowing the orderly progress toward the ultimate goal of compatibility.

The evolutionary paths described in the JEM Reports are the consensus recommendation of public safety organizations, U.S. standards organizations, U.S. trade industry organizations, North American service providers and manufacturers. The evolutionary paths provide a blueprint for continued efforts to achieve compatibility. The TIA, therefore, recommends that the Commission reconsider its proposed mandatory deadlines and instead, facilitate the development of Standards and technology by wireless service providers, manufacturers, landline local exchange

carriers and public safety systems. The JEM Reports have provided input to Standards bodies that are proceeding with the development of common system interfaces.

The most appropriate role for the Commission would be to require the affected Standards bodies to periodically report their progress in the development of compatibility Standards. Some elements of compatibility could be established within a relatively short period of time. Other elements of compatibility, such as automatic location identification, will take considerably longer. In no case can the Commission establish deadlines that are anything more than arbitrary. Any time frames established by the Commission should be in the nature of goals rather than cut-off dates for compliance.

CONCLUSION

TIA urges the Commission to review and revise its proposed Rules in accordance with these Comments. The technical work to implement Enhanced 911 Calling Service is already underway and the FCC should encourage the affected interest groups to continue this work. Any final Rules need to recognize the differences between the installed base and new equipment as well as the fact that the installation

of the equipment and its configuration at the time of installation -- including adjunct equipment -- is what determines whether Enhanced 911 compatibility has been achieved.

Respectfully submitted,

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